

**1 BOIES SCHILLER FLEXNER LLP**

2 David Boies (admitted pro hac vice)  
 333 Main Street  
 3 Armonk, NY 10504  
 4 Tel: (914) 749-8200  
 dboies@bsflp.com

5 Mark C. Mao, CA Bar No. 236165  
 Beko Reblitz-Richardson, CA Bar No.  
 6 238027  
 Erika Nyborg-Burch, CA Bar No. 342125  
 7 44 Montgomery St., 41st Floor  
 San Francisco, CA 94104  
 8 Tel.: (415) 293-6800  
 mmao@bsflp.com  
 brichardson@bsflp.com  
 enyborg-burch@bsflp.com

9 James Lee (admitted pro hac vice)

10 Rossana Baeza (admitted pro hac vice)  
 11 100 SE 2nd St., 28th Floor  
 Miami, FL 33131  
 12 Tel.: (305) 539-8400  
 jlee@bsflp.com  
 rbaeza@bsflp.com

13 Alison L. Anderson, CA Bar No. 275334  
 14 725 S Figueroa St., 31st Floor  
 Los Angeles, CA 90017  
 15 Tel.: (213) 995-5720  
 alanderson@bsflp.com

**SUSMAN GODFREY L.L.P.**

Bill Carmody (admitted pro hac vice)  
 Shawn J. Rabin (admitted pro hac vice)  
 Steven M. Shepard (admitted pro hac vice)  
 Alexander Frawley (admitted pro hac vice)  
 1301 Avenue of the Americas, 32nd Floor  
 New York, NY 10019  
 Tel.: (212) 336-8330  
 bcarmody@susmangodfrey.com  
 srabin@susmangodfrey.com  
 sshepard@susmangodfrey.com  
 afrawley@susmangodfrey.com

Amanda K. Bonn, CA Bar No. 270891  
 1900 Avenue of the Stars, Suite 1400  
 Los Angeles, CA 90067  
 Tel.: (310) 789-3100  
 abonn@susmangodfrey.com

**MORGAN & MORGAN**

John A. Yanchunis (admitted pro hac vice)  
 Ryan J. McGee (admitted pro hac vice)  
 201 N. Franklin Street, 7th Floor  
 Tampa, FL 33602  
 Tel.: (813) 223-5505  
 jyanchunis@forthepeople.com  
 rmcgee@forthepeople.com

Michael F. Ram, CA Bar No. 104805  
 711 Van Ness Ave, Suite 500  
 San Francisco, CA 94102  
 Tel: (415) 358-6913  
 mram@forthepeople.com

20 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

21 CHASOM BROWN, WILLIAM BYATT,  
 22 JEREMY DAVIS, CHRISTOPHER  
 23 CASTILLO, and MONIQUE TRUJILLO  
 24 individually and on behalf of all other  
 similarly situated,

25 v. Plaintiffs,

26 GOOGLE LLC,

27 Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

28 **SECOND DECLARATION OF MARK  
 MAO IN SUPPORT OF PLAINTIFFS'  
 MOTION FOR CLASS CERTIFICATION  
 (DKT. 609)**

Judge: Hon. Yvonne Gonzalez Rogers  
 September 20, 2022  
 Time: 2:00 p.m.  
 Location: Courtroom 1 – 4th Floor

1 I, Mark Mao, declare as follows:

2 1. I am a member of the Bar of California and a partner at the law firm of Boies  
3 Schiller Flexner LLP, counsel to Plaintiffs in this matter. I make this declaration in support of  
4 Plaintiffs' motion for class certification (Dkt. 609). I make this declaration based upon matters  
5 within my own personal knowledge. If called as a witness, I could and would competently testify  
6 to the matters set forth herein.

7 2. Attached hereto as **Exhibit 92** is a true and correct copy of the transcript from the  
8 June 30, 2022 deposition of Google employee Sabine Borsay, taken by Plaintiffs. For ease of  
9 reference, I have numbered the exhibits attached hereto so as to continue where the exhibit  
10 numbering left off in my prior Declaration in Support of Plaintiffs' Motion for Class Certification  
11 (Dkt. 609-17), filed on June 21, 2022. The final exhibit to that Declaration was Exhibit 91.

12 3. Attached hereto as **Exhibit 93** is a true and correct copy of the transcript from the  
13 August 22, 2022 deposition of Google expert Georgios Zervas, taken by Plaintiffs.

14 4. Attached hereto as **Exhibit 94** is a true and correct copy of email communications  
15 between my colleagues and counsel for Google between May 20, 2022, and June 3, 2022.

16 5. Attached hereto as **Exhibit 95** is a true and correct copy of the transcript from the  
17 August 16, 2022 deposition of Google expert On Amir, taken by Plaintiffs.

18 6. Attached hereto as **Exhibit 96** is a true and correct copy of the transcript from the  
19 July 15, 2022 deposition of Plaintiffs' expert Mark Keegan, taken by Google.

20 7. Attached hereto as **Exhibit 97** is a true and correct copy of a document that Google  
21 produced, labeled GOOG-BRWN-00856578, which Google produced on July 6, 2022, in response  
22 to the Court's privilege re-review order (Dkt. 605).

23 8. Attached hereto as **Exhibit 98** is a true and correct copy of the transcript from the  
24 August 19, 2022 deposition of Google expert Konstantinos Psounis, taken by Plaintiffs.

25  
26 I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th  
27 day of August 2022 in San Francisco, California.  
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1 By: /s/ Mark C. Mao  
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Mark C. Mao  
BOIES SCHILLER FLEXNER LLP